Case 2:25-mj-30100-DUTY ECF No. 1 PageID 1 Filed 02/28/25 Page 1 of 6 AUSA: PageID 1 Filed 02/28/25 Page 1 of 6 226-9100

AO 91 (Rev. 11/11) Criminal Complaint Special Agent: Sean Callahan Telephone: (313) 965-2323

# UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America
v.
Allante Javon JONES

Case: 2:25-mj-30100

Case No. Assigned To: Un assigned Assign. Date: 2/28/2025

Description: CMP USA V. JONES

(DJ)

#### CRIMINAL COMPLAINT

CRIMINAL COMPLAINI						
I, the complainant in this ca	se, state that th	e following is true	to the best of my knowle	dge and belief.		
On or about the date(s) of		ua <u>ry</u> 25, 2025	in the county of	Washtenaw	in the	
Eastern District of	Michigan	, the defendant	(s) violated:			
Code Section		Q	ffense Description			
18 U.S.C. § 922(g)(1)		Felon in possession of a firearm				
This criminal complaint is b	oased on these	facts:				
Continued on the attached shee	t.					
		1	Complainant's signature		-	
			Joshua Loy, Special			
Sworn to before me and signed in my prese	ence	Printed name and title				
and/or by reliable electronic means.			ينكا	M ARK		
Date: _February 28, 2025			Judge's sig	nature		
City and state: Detroit, Michigan			Hon. Kimberly G. Altman,		ge	
			Printed name		-	

# **AFFIDAVIT**

I, Joshua Loy, being duly sworn, depose and state the following:

### I. INTRODUCTION

- 1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been employed as a special agent with the ATF since June 2018. I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered to conduct investigations and make arrests of offenses enumerated under federal law. I am currently assigned to the ATF Detroit Field Division's Ann Arbor office. I graduated from the Federal Law Enforcement Training Center and the ATF Special Agent Basic Training Course. I am responsible for investigating violations of federal firearms laws, among other crimes. During my time in law enforcement, I have participated in numerous criminal investigations involving firearms crimes, armed drug tracking violations, and offenses by criminal street gangs, among others.
- 2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my

training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

3. The ATF is currently investigating Allante Javon Jones for violating 18 U.S.C. § 922(g)(1), being a felon in possession of a firearm.

#### II. PROBABLE CAUSE

- 4. On February 25, 2025, at approximately 10:10 pm, deputies with the Washtenaw County Sherriff's office were travelling eastbound on Russel Street in Ypsilanti Township, Michigan when they observed a black Jeep Compass traveling westbound on the same road. The Jeep Compass was travelling at approximately 45 miles per hour in a 25 mile per hour neighborhood. The deputies turn around and saw the Jeep Compass accelerate and run through a stop sign without stopping. Deputies continued their pursuit of the vehicle as it fled at high speeds and ultimately turned onto a dead-end street. Ultimately, deputies noticed the vehicle crash into railroad tracks at the dead end of S. Harris Road.
- 5. After the crash, deputies observed a Black male wearing a light-colored top with pink colored pants exit the driver's side of the vehicle and run northbound from the railroad tracks. The deputies ran after the suspect and saw the suspect run across the street and through a Speedway parking lot. The deputies continued to chase the suspect and ultimately apprehended him on the property of a

business on East Michigan Avenue. Deputies arrested the suspect, and he provided them with his name, Allante JONES.

- 6. Deputies searched the area where the foot chase took place and located a firearm on the ground in the north side of the La Marqueza restaurant, where Jones had run through. The firearm, a Ruger LCP 380, was located among many articles of trash. Deputies did not touch the firearm. They instead brought a canine, Vukis, who has certified as a tracking, drug detection, and patrol dog by National Association of Professional Canine Handles and the canine alerted on the located handgun by laying down next to it. The canine did not alert on any of the other pieces of trash which shows that the handgun had the presence of human odor and was new to the environment/recently placed there.
- 7. Deputies did a canvass of the businesses in the area and located video surveillance footage from the time of the foot chase. That video surveillance showed Jones running through the property of the La Marqueza restaurant, in the same location where the firearm was found, on his way to the Speedway gas station.
  - 8. The recovered Ruger LCP 380 was reported stolen.
- 9. I consulted with an interstate nexus expert who confirmed that the Ruger LCP had travelled in interstate commerce.

- 10. Deputies then searched the vehicle that Mr. Jones had crashed and discovered blue pills stamped with an "M" to resemble oxycodone hydrochloride but believed to contain fentanyl. The pills were field tested, but the results were inconclusive. The pills have been sent to the MSP lab for testing.
- 11. I reviewed records related to JONES' criminal history and learned the following:
  - a. 2010: Pleaded guilty to felony police officer –
    assaulting/resisting/obstructing and was sentenced to
    confinement for 365 days;
  - b. 2014: Pleaded guilty to assault with a dangerous weapon and resisting and obstructing and was sentenced to confinement for 10 months to 4 years; and felony firearm for which he was sentenced to confinement for 2 years
- 12. Based on my training and experience, I understand that individuals who plead guilty to felony offenses are advised at their plea/sentencing hearings of the consequences of their guilty plea, including the nature of the offenses that they have pleaded guilty to. I also understand that individuals who have served prison sentences for felony offenses are similarly advised that they are felons and are not permitted to possess firearms. Based on the above, I have probable cause to believe that JONES knew he had previously been convicted of an offense punishable by more than one year in prison.

# III. CONCLUSION

13. There is probable cause to believe that on February 25, 2025, in the Eastern District of Michigan, Allante JONES knowingly possessed a firearm after having been convicted of a felony offense, that he knew of his felony status at the time, and that the firearm affected interstate or foreign commerce, all in violation of 18 U.S.C. § 922(g)(1).

Special Agent Joshua Loy

Bureau of Alcohol, Tobacco, Firearms and Explosives.

Sworn to before me and signed in my presence And/or by reliable electronic means.

Honorable Kimberly G. Altman

United States Magistrate Judge

Date: February 28, 2025